SGS DATA PRIVACY INFORMATION NOTICE FOR TRAINING CUSTOMERS

The protection of your personal data is important to SGS Group which has adopted, strong principles in this area as stated in its Data Privacy Policy available at https://www.sgs.es/es-es/privacy-at-sgs. This Data Privacy Policy is applicable to any affiliate Company of the SGS Group, regardless of the country in which they are located (hereinafter, the "SGS Group").

Pursuant to Organic Law 3/2018 of December 5, on Personal Data Protection and guarantee of digital rights (Ley Orgánica 3/2018 de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales) and the EU Regulation n. 679/2016 (hereinafter the "GDPR"), SGS TECNOS, S.A.U, as parent company of SGS Group Spain (hereinafter the "SGS") provides the following information to its training customers (hereinafter the "Learner" or "Learners"), about SGS's processing of Learner's personal data, when the Learner participates in a training provided by SGS on-site or virtually (through technology providers such as QIIQ (Libestream), skype, teams, zoom, adobe connect...).

1. DATA CONTROLLER AND CONTACT DETAILS.

SGS TECNOS, S.A.U., with tax identification number A 28345577 and registered office at Calle Trespaderne 29, 28042 Madrid is responsible for the collection and processing of personal data for the provision of the services defined in the contracts entered into with its clients, as well as for carrying out the procedures prior to contracting, within the framework of the corresponding service offering (hereinafter, the "Service").

Notwithstanding the foregoing, in view of the specific contractual relationship entered into and the processing of personal data arising therefrom, the role of data controller may fall to another entity within the SGS Spain Group, in accordance with the provisions of the relevant contractual instruments signed between the parties. The up-to-date list of companies comprising the SGS Group in Spain is available for consultation on the SGS corporate website, in the "SGS in Spain" section (https://www.sgs.com/es-es/nuestra-empresa/acerca-de-sgs/sgs-en-espana). In the event that such information is temporarily unavailable, the data subject may obtain it through the contact channels provided for this purpose and indicated in this Privacy Notice (hereinafter, the "Notice").

If you have any questions or comments about this Data Privacy notice, please contact us:

- through the online privacy request form available at n https://www.sgs.es/es-es/online-privacy-statement/privacy-request-form
- by e-mail at es.dataprotectionofficer@sgs.com
- by mail to the following address: Calle Trespaderne 29, 3º planta, 28042, Madrid (España) – for the attention of Data Protection Officer.

2. CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED.

The Data processed by the Company usually include:

- contact information (name, surname, postal address, telephone number, email addresses); and
- financial details (ID number, tax number identification, billing address).
- personal information (country, time zone);
- Electronic identification data (such as cookies, IP addresses and passwords);
- professional and employment information academic and professional background such as job title, business sector.
- any other data which we process Data in the context of our business relationship and in order to provide services as part of the execution of our contractual obligations with our Learner.

3. PURPOSE AND BASIS OF THE PROCESSING AND NATURE OF THE PROVISION OF DATA.

When the Service is contracted by the company to which the Learner belongs, it is the company that provides us with the Learner's contact information

We have multiple ways of providing the Services, either face-to-face, at any of our offices or at the Learners' own premises, and virtually, either through our own, outsourced or the Learners' own platforms.

Your Data will not be used for purposes other than those listed here.

a) For fulfillment of contractual obligations (Art. 6.1.b of the GDPR).

   Data is processed for the performance of the contracts with the Learner and for managing our business relationship with them and to ensure the proper execution of services, e.g., by handling Partner service-related queries or issuing invoices. The purposes of data processing are primarily in compliance with the specific service. You can find other details about the purposes of data processing in the Contractual specific terms and conditions.

b) For the purposes of the legitimate interests (Art. 6.1.f of the GDPR).

   Where required and without unduly affecting Learner' privacy interests or fundamental rights and freedoms, SGS will process the Data beyond the actual fulfillment of the contract for the purposes of SGS legitimate interests pursued directly by the SGS Group or by a third party. These legitimate interests may include:

   - Service-related communications (e.g. operational notices, incident management or reminders regarding expiry dates/ renewals where these form part of the contracted service)."
   - Marketing communications regarding SGS Group services that may be of interest to you (e.g. information on services similar to those provided or the sending of newsletters). You may opt out of marketing communications at any time by using the unsubscribe option included in each communication or by requesting this via the channels indicated in section 1.
   - Help SGS to obtain more information about its Learner, services they receive, and other products and services they may be interested in receiving by conducting opinion research.
   - Assess claims and defending in legal disputes;
   - Guarante SGS Group IT security and environment infrastructure;
   - Carry out risk management and compliance task.
   - To carry out or complete any transaction or order you have placed through our websites; and
   - Set up and manage your Learner account.

c) As a result of your consent (Art. 6.1.a of the GDPR).

   As long as you have granted us consent to process the Data for certain purposes (e.g., marketing purposes), this processing is legal on the basis of your consent. Your consent is always optional and can be withdrawn at any time. This also applies to withdrawing declarations of consent that were given to SGS before the GDPR came into force, i.e., before 25th May 2018. For the avoidance of doubt, withdrawal of consent shall not affect the legality of data processed prior to such withdrawal.

d) Due to legal obligations (Art. 6.1.c of the GDPR) or in the public interest (Art. 6.1.e of the GDPR).

   Furthermore, we are subject to various legal obligations, i.e., regulatory and statutory requirements. Purposes of processing include fulfilling control and reporting obligations under fiscal laws or, in certain cases, due to accreditation, certification and / or training mandatory requirements.

Where the Data we collect is needed to meet SGS legal or regulatory obligations or enter into an agreement with you or is needed for legitimate purposes, if SGS cannot collect this Data, SGS will be unable to engage you as a Learner or provide its services and fulfill its contractual obligations (in which case SGS will inform you accordingly).

4. WHO HAS ACCESS TO DATA AND TO WHOM IT IS SHARED.

The Data may be disclosed:

a) within the SGS Group to other SGS affiliates in order to provide services to Learner and ensure a consistent standard of service across our group. SGS Group Affiliates will act as data processors appointed pursuant to art. 28 GDPR or as autonomous data controllers depending on the circumstances and purposes.

b) to third parties who need to carry out specific activities in relation to the Data, according to the purposes of the processing, or to service providers who provide services to SGS such as IT and hosting providers (as Seertech, Help Desk ...),, marketing providers, travel providers, debt collection providers, sub contractors . When we do so we take steps to ensure they meet our data security standards, so that your Data remains secure.

c) to authorities, entities, customers and/ or subjects to whom they must be communicated according to legal or contractual mandatory provisions (Fundación Laboral de la Construcción, Fundación del Metal, Consejerias de Sanidad…). These authorities, bodies, customer, partner and/ or subjects will act as independent data controllers.

In the event that the service provided involves the management of some type of subsidy, we will need to communicate your data to the corresponding entities or organizations (Fundae).

d) in other circumstances such as acquisitions and sale to third party prospecting companies when we envisage selling or transferring part or all of our business providing that all contract measures are taken to ensure they meet our security standards so that your Data remains secure.

5. INTERNATIONAL TRANSFER OF DATA.

In case of transfer of Data internationally, we ensure that we have taken steps to protect the Data before transfer.

SGS transfers Data to SGS Group entities or to third parties located within or outside the European Economic Area (EEA) where:

a) this is justified for legal or contractual purposes; and

b) safeguards have been implemented to ensure that Data will continue to be protected at a minimum with the same level of protection required in the jurisdiction of origin. To ensure this level of protection for your personal information, SGS may use standard contractual clauses approved by the European Commission or ensure that the transfer is to a jurisdiction that is the subject of an adequacy decision by the European Commission.

Any transfer of the Data to international organisations and/or countries not located within the European Economic Area (EEA) will take place in accordance with the GDPR through the mechanisms permitted by current legislation. You may request information about the safeguards applied to international transfers through any of the contact channels indicated in section 1.

6. HOW DATA IS PROTECTED.

SGS implements appropriate technical and organisational measures to protect Data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of technology, their cost of implementation, the risks presented by the processing and the nature of the Data, with particular care for special categories of Data. In particular, there is adequate awareness, confidentiality undertakings and training are in place to ensure that Data is not shared or disclosed to unauthorised persons.

SGS has taken the necessary measures to ensure that suppliers who process the Data comply with our security standards so that the "Data" remains secure.

SGS does not knowingly collect or solicit personal data from persons under the age of 14. If you are under the age of 14, please speak to your parents/ guardians to obtain their permission before providing any personal information to SGS, as, without this consent, you are not permitted to provide us with your personal data. If we become aware that we have collected data from a person under the age of 14, we reserve the right to delete such data without prior notification or consent.

7. HOW LONG DATA IS STORED.

The Data will be stored on paper and/or electronically for only the time necessary for the purposes for which it was collected, respecting the principles of limitation of conservation and minimisation referred to in Art. 5.1, letters c) and e) of the GDPR.

The Data will be kept to comply with regulatory obligations and to pursue the above-mentioned purposes, in compliance with the principles of necessity, minimisation and adequacy.

SGS may retain Data after termination of the contractual relationship to fulfill regulatory and/or contractual and tax obligations or in case of legal claims. Subsequently, when the aforementioned reasons for the processing will cease, the Data will be anonymised, deleted or destroyed.

8. DATA SUBJECTS RIGHTS.

Each Data subject can exercise the following rights referred in articles 15-22 GDPR by sending a request in writing to the SGS at the above-mentioned contact details:

- To access: you can obtain information relating to the processing of your Data and a copy of such Data.
- To erase: you can require the deletion of your Data, to the extent permitted by law.
- To object: you can object to the processing of your Data, on grounds relating to your particular situation. In cases of opposition to the processing of data pursuant to art. 21 GDPR, SGS reserves the right to assess the application, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over your freedoms, interests and rights.
- To rectify: where you consider that your Data is inaccurate or incomplete, you can require that such Data be modified accordingly.
- To restrict: you can request the restriction of the processing of your Data.
- To withdraw your consent: where you have given your consent for the processing of your Data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the Data you have provided to us returned to you or, where technically feasible, transferred to a third party.

We strive to maintain fluid communications with the Learner comunications and deal properly with the issues raised. If you are not satisfied with SGS answer received or the processing of your Data, please contact us via the methods listed in section 1 above. Should you not be satisfied with us or you believe that the processing of your Data is contrary to the legislation in force, you have the right to lodge a complaint to a supervisory authority (Agencia Española de Proteccion de Datos AEPD) pursuant to Art. 77 GDPR.

SGS is committed to keeping your Data accurate and up to date. Therefore, if your Data changes, please inform us of this change as soon as possible.

DATA PRIVACY NOTICE STATUS AND UPDATE.

This Data Privacy Notice was updated in June 2026. SGS reserves the right to amend it from time to time. If the Notice has been updated, SGS will take steps to inform its Learner of the update by appropriate means, depending on how SGS normally communicate with such Learner.

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When you need to be sure